

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. By this Amendment, Applicants have canceled claims 6 and 16. Thus, claims 1-5 and 7-15 are now pending in the application. Applicants respectfully submit that the pending claims define patentable subject matter.

Rejection under 35 U.S.C. § 112, first paragraph

Claims 5, 6 and 16 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. The Examiner also alleges that a certain limitation in claim 5 conflicts with the description in paragraphs 0078, 0079, 0092, and 0093 of the specification.

Applicants amend claim 5 for purposes of clarity. Applicants submit that amended claim 5 complies with 35 U.S.C. § 112, first paragraph. Applicants also submit that the specification describes claim 5 in sufficient detail so as to enable a person of ordinary skill in the art to make and/or use the invention without undue experimentation, for example the description at [0078]-[0080].

With regard to claims 6 and 16, the Examiner asserts that “there is no description or evidence found in the spec that the web server comprises a middleware server”. Applicants have canceled claims 6 and 16. Therefore, the 112, first paragraph, rejection of these claims is now moot.

Rejection under 35 U.S.C. § 112, second paragraph

Claim 4 is rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Applicants amend claim 4 and submit that claim 4 complies with 35 U.S.C. § 112, second paragraph. Applicants submit that the tunnel request message recited in claim 4 refers back in the antecedent to the tunnel request message sent to the gateway of the second private network. Accordingly, the Examiner is requested to withdraw the § 112, second paragraph, rejection.

Allowable Subject Matter

The Examiner has indicated that claims 9, 10, and 15 contain allowable subject matter and would be allowable if rewritten in independent form and including all the limitations of the base claim and the intervening claims. See Office Action page 11.

Applicants request the Examiner to hold in abeyance any such rewriting of the claims until the Examiner has had a chance to reconsider and withdraw the rejection of the other claims.

Prior Art Rejections

Claim 1 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Arrow et al. (US Patent No. 6,226,751; hereinafter "Arrow") in view of Larson (US Patent No. 7,209,479; hereinafter "Larson").

Applicants amend claim 1 and traverse the rejection. Claim 1 now recites, in part, "the communicating with a gateway comprises sending a tunnel setup request message comprising a network address of the first private network and a second network address to be used in the VPN

tunnel as a network address of the first private network". This limitation was originally recited in claim 9, which the Examiner indicated as containing allowable subject matter.

Applicants submit that claim 1 is patentable and not rendered obvious by the combination of Arrow and Larson. In particular, Applicants submit that the combination of Arrow and Larson does not teach or suggest at least the feature of "the communicating with a gateway includes sending a tunnel setup request message comprising a network address of the first private network and a second network address to be used in the VPN tunnel as a network address of the first private network". Thus, the combination of Arrow and Larson fails to teach or suggest every feature recited in claim 1.

Therefore, Applicants respectfully request the Examiner to withdraw the § 103 rejection of claim 1.

Claims 2, 3, 6-8, 11-14 and 16 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Arrow in view of Larson and further in view of Chen (US Patent Application Pub. No. 2003/0028650 A1; hereinafter "Chen").

Chen does not remedy the above noted deficiency of the combination of Arrow and Larson. Applicants submit that claims 2, 3, 6-8, 11-14, and 16 are patentable at least by virtue of their dependency from claim 1 and because the combination of Arrow, Larson and Chen does not teach every feature of claim 1.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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